

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-------------------------------------|---|------------------|
| MICHAEL YOUNG, |) | |
| |) | |
| Plaintiff, |) | 08 C 302 |
| |) | |
| vs. |) | Honorable Judge |
| |) | Virginia Kendall |
| LIEUTENANT MARILYN MARTINEZ et. al. |) | |
| |) | |
| Defendants. |) | |

**DEFENDANTS' MOTION SEEKING LEAVE OF COURT TO DEPOSE PLAINTIFF IN
ACCORDANCE WITH RULE 30**

NOW COMES Defendants, Cook County Sheriff Thomas Dart, Lieutenant Marilyn Martinez, Lieutenant Richard Dominguez, Officer Danielle Harms, Officer Thomas Cintron and Mr. Lone Williams, by their attorney, Richard A. Devine, State's Attorney of Cook County, through his assistant, Michael L. Gallagher, and pursuant to Rule 30 of the Federal Rules of Civil Procedure (FRCP), state as follows:

1. Plaintiff is currently incarcerated in the Cook County Department of Corrections for the charge of Reckless Homicide.
2. Plaintiff filed his Amended Complaint on August 8, 2008, and Defendants filed their answer on September 10, 2008.
3. Plaintiff's motion for appointment of counsel was denied July 11, 2008, and he is proceeding *pro se*.

WHEREFORE YOUR DEFENDANTS PRAY:

1. That this Honorable Court grant Defendants leave to depose Plaintiff in accordance with FRCP 30.
2. That this Honorable Court grant any other relief it deems just.

Respectfully Submitted,

By: /s/ Michael L. Gallagher
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